

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	Chapter 11
)	
)	Case No. 20-33948 (MI)
FIELDWOOD ENERGY LLC, <i>et al.</i> , ¹)	
)	(Jointly Administered)
)	
Debtors.)	
)	

**JOINDER AND RESERVATION OF RIGHTS REGARDING BEDROCK PETROLEUM
CONSULTANTS, LLC’S RESERVATION OF RIGHTS AND LIMITED OBJECTION
TO DIP FINANCING AND CASH COLLATERAL MOTION**

(Relates to Docket Nos. 22, 192)

Kilgore Marine (“Kilgore”), creditor and party in interest, files this joinder to and reservation of rights with respect to the limited objection filed by Bedrock Petroleum Consultants, LLC (“Bedrock”) to the *Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing (Docket No. 22) (the “DIP Motion”), and in support thereof, Kilgore would show the Court the following:*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

1. As of the Petition Date, Kilgore possesses claims against the Debtors in the aggregate amount of approximately \$10,440,000.

2. With respect to such claims, Kilgore has perfected and/or is entitled to perfect mineral liens and/or other statutory liens against the interests in property of the Debtors.

3. Kilgore joins the limited objection filed by Bedrock (Docket No. 192) as if fully set forth verbatim herein to the extent that such objection relates to the interests of Kilgore. In addition, Kilgore requests that it also be listed in the proposed language.

4. Based upon the foregoing, Kilgore further reserves the right to object to the entry of the Final DIP Order, including the inclusion (or absence, as the case may be) of the additional language proposed by Bedrock.

5. Kilgore reserves the right to raise such further and additional objections, and/or to join in any other objections relating to the DIP Motion at any time prior to the hearing considering the DIP Motion on a final basis.

6. Kilgore further reserves all rights with respect to these bankruptcy cases, all rights under any contracts and operating agreements, all rights related to any notices of assumption and cure, and all rights with respect to any claim it may assert or has asserted in this case, including, but not limited to, administrative priority claims that may arise, adequate protection for such expenditures, and all other rights in this case.

WHEREFORE, Kilgore respectfully requests that this Court sustain the limited objection. Kilgore requests such other and further relief to which it is entitled at law or in equity.

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Dated: August 22, 2020

Respectfully submitted,

By: /s/ John F. Higgins

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CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on August 22, 2020.

/s/John F. Higgins

John F. Higgins